2002 Proposed Plan public mtg. handouts

Frequently Asked Questions

Q. Why did you choose 540 ppm for lead?

A. At VB/I-70, 540 ppm is a level determined by an EPA recommended model that predicts blood lead levels in children and by looking at actual levels of lead measured in area children. It is the product of a 3-year investigation and a thorough risk analysis that tell us that soil with lead levels at 1100 ppm or lower in these neighborhoods is safe. Given, however, the other sources of lead that may be present in a child's home, EPA decided to select a more protective standard of 540 ppm. In making this determination, EPA worked with scientists from the Colorado Department of Public Health & Environment, the Denver Department of Environmental Health, the Agency for Toxic Substances and Disease Registry and an expert hired by a local citizen's group.

Q. Why did you choose 128 ppm for arsenic?

A. Our science tells us we could choose a higher cleanup number, up to 240 ppm, and be protective. However, the State of Colorado preferred that we remove soils at 128 ppm of arsenic or above. EPA agreed.

Q. Some community members are advocating that you choose 400 ppm rather than 540 ppm for lead. Why don't you do that?

A. We could clean up soil where lead is above 400 ppm lead, and if we are provided convincing reason to do so, we will. However, all of our information at this point indicates it is not necessary. 400 ppm is used simply as a screening level at Superfund sites. *"Screening levels are not cleanup goals. Rather, these screening levels may be used as a tool to determine which sites or portions of sites do not require further study and to encourage voluntary cleanup. Screening levels are defined as a level of contamination above which there may be enough concern to warrant site-specific study of risks. Levels of contamination above the screening level would NOT automatically require a removal action, nor designate a site as "contaminated" (Revised Interim Soil Lead Guidance for CERCLA Sites and RCRA Corrective Action Facilities, OSWER Directive #9355.4-12).*

Q. Why don't you choose a lower cleanup level for soil to make up for the all of the other environmental hazards in the area, like industry and highways?

A. The information we have today indicates that cleaning up lead and arsenic in soil to even lower levels is not going to address those other impacts. The areas most affected by industry and highways are not necessarily the same areas that would have more yards cleaned up if EPA lowered the soil cleanup levels. That is why we are looking at other ways to address the many sources of environmental contamination in theses neighborhoods.

Q. These cleanup numbers are different than those chosen next door in Globeville. Why is that?

A. Nine years have passed since the Globeville cleanup numbers were established. The science used to determine safe levels of contaminants in soil has evolved since then. Further, our investigation at the VB/I-70 site was extremely detailed and thorough so that our cleanup levels would be as accurate as possible for residents of these neighborhoods. For instance, we measured the amount of arsenic and lead in indoor dust, not just soil; we measured the levels of arsenic and lead in the fine particles of soil as well as the bigger particles; and we took up to 30 soil samples in every yard to be more confident in our measurements of lead and arsenic throughout the yard.

We also did studies to measure how much of the lead and arsenic in soil from VB/I-70 is likely to be absorbed in the body. These studies were not done at the Globeville site and so were not factored into the cleanup numbers.

Q. If my yard does not need to be removed and replaced, am I safe? Are my kids safe?

A. Yes. If your yard does not need to be replaced, then your soil contains levels of arsenic and lead that pose no significant health risk to you or your children. The only remaining concern could be if your child has a condition called soil pica behavior, a habit of eating unusually large amounts of dirt. Nobody knows how many children exhibit soil pica behavior or how often, but it is thought to be rare. This could be a health concern even where arsenic and lead levels are low because soil can contain bacteria or other harmful substances. The proposed Community

Health Program will be designed to help these children.

Q. Some people are saying that the Community Health Program is just education and it won't work. Is this true?

A. No. The Community Health Program is much more than just education. It has three important parts that will work together to tailor an individual response for children who are at risk because of soil pica behavior or exposure to lead from sources other than soil. The three parts are:

(1) education to raise awareness, (2) testing to identify children with higher than normal exposures, and (3) investigation and response to identify soil and non-soil sources of lead and arsenic at homes of children with greater than normal exposure, and to address the problem by working with EPA, CDPHE, and local groups who can assist in lead paint problems.

Q. How does your plan compare with what is being done in other places?

A. Soil cleanup levels are determined on a site-by-site basis. They tend to vary, based on the type of lead or other contaminant present and the ways residents are being exposed at each site. There are some places across the nation that have decided on even lower levels, and many that have decided on much higher. Our cleanup levels at VB/I-70 are some of the lowest the EPA has considered in the Rocky Mountain region ***(See attachment)***.

What is the same at every site is the level of protection that is provided. At VB/I-70 and all other sites, EPA sets soil cleanup levels with a margin of safety to protect sensitive people and people with high contact with soil.

Q. Some people are charging that the EPA is basing this whole cleanup decision on one study. Is this true?

A. No. They may be referring to an important study that we conducted to determine how much lead in soil at VB/I-70 can be absorbed into the body. We have spent three years and millions of dollars on many different scientific techniques to increase the accuracy in our measurements of everything that determines safe cleanup levels for the residents of these neighborhoods.

Do you have a question?

We might be able to answer it in the section below. The following are some of the most frequently asked questions we receive about our Proposed Plan and preferred cleanup alternative.

Q. What am I commenting on?

A. Please let us know about any facts, considerations, or details that we may have missed or not considered in developing our Proposed Plan for cleanup.

Q. Why did you choose 540 ppm for lead?

A. At VB/I70, 540 ppm is a level derived from state-of-the-art science and actual levels of lead found in area children. It is the product of a 3-year investigation and a thorough risk analysis that tell us that soil with lead levels at 540 ppm or lower in these neighborhoods is safe.

Q. Why did you choose 128 ppm for arsenic?

A. Our science tells us we could choose a higher cleanup number, up to 240 ppm, and be protective. However, the State of Colorado preferred that we remove soils at 128 ppm of arsenic or above. EPA agreed.

Q. Some community members are advocating that you choose 400 ppm rather than 540 ppm for lead. Why don't you do that?

A. We could clean up lead to 400 ppm, and if we are provided convincing reason to do so, we will. However, all of our information at this point indicates it is not necessary. 540 ppm is already so protective of residents' health that going to 400 ppm would simply cost more money, take more time, and the health benefit gained would be minimal.

Q. Why don't you choose a lower cleanup level for soil to make up for the all of the other environmental hazards in the area, like industry and highways?

A. Cleaning up lead and arsenic in soil to even lower levels is not going to address those other impacts. That is why we are looking at other ways to address the many sources of environmental contamination in theses neighborhoods.

Q. These cleanup numbers are different than those chosen next door in Globeville. Why is that?

A. Ten years have passed since the Globeville cleanup and the science used to determine safe levels of contaminants in soil has been updated. Further, our investigation at the VBI70 site was extremely detailed and thorough so that our cleanup levels would be as accurate as possible. For instance, we included the amount of contamination in indoor dust, not just soil, and we took up to 30 individual soil samples in every yard.

Q. If my yard does not need to be removed and replaced, am I safe? Are my kids safe?
A. Yes. If your yard does not need to be replaced, then your soil contains levels of arsenic and lead that pose no significant health risk to you or your children. The only remaining concern could be if your child exhibits a behavior called Soil Pica Behavior, a habit of eating unusually large amounts of dirt. This behavior, however, is considered very rare.

Q. How does your plan compare with what is being done in other places?
A. Soil cleanup levels are determined on a site by site basis. They tend to vary, based on the type of lead or other contaminant present, and the ways residents are being exposed at each site. There are some places across the nation that have decided on even lower levels, and many that have decided on much higher. Our cleanup levels at VBI70 are some of the lowest the EPA has considered in the Rocky Mountain region.

Q. Some people are charging that the EPA is basing this whole cleanup decision on one study. Is this true?
A. No. They may be referring to an important study that we conducted to determine how much lead residents are absorbing into their bodies. We have spent three years and millions of dollars on many different scientific techniques to accurately determine safe cleanup levels for the residents of these neighborhoods.

Q. Who can I talk to if I am concerned about lead and arsenic in my yard or in my neighborhood?
A. If you have questions or concerns, please feel free to contact Jennifer Chergo, EPA Community Involvement Coordinator, at (303) 312-6601, or Patricia Courtney, EPA Community Involvement Coordinator, at (303) 312-6601. You may also dial our toll-free number at 1-800-227-8917 and ask for us by name.